

1 District Judge James L. Robart  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 JULIO CURY and TAKAO YAMADA,

Case No. 2:23-cv-00499-JLR

10 Plaintiffs,

STIPULATION FOR AN EXTENSION  
11 v. OF TIME

12 DEPARTMENT OF STATE, and  
DEPARTMENT OF HOMELAND  
13 SECURITY,

Noted for Consideration:  
September 18, 2024

14 Defendants.

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16 Due to some confusion with Plaintiff's identification of issues to be litigated, the Parties  
17 continued to meet and confer after the September 6, 2024 deadline. The full set of issues to be  
18 litigated is now understood by all parties. While some of these issues may still be resolved short  
19 of litigation, the parties will need to file summary judgment briefs. In light of the delay,  
20 however, the parties have agreed to extend the earlier proposed briefing schedule by two weeks.

21 Thus, the parties stipulate to and propose the following schedule:

- 22 1. Defendants will file their opening summary judgment brief on any identified issues  
23 on or before October 11, 2024;

2. Plaintiffs will file their opposition and cross-motion, if any, on or before November 8, 2024;
3. Defendants will file their reply and opposition to any cross-motion, if any, on or before November 29, 2024;
4. and Plaintiffs will file their reply in support of their cross-motion, if any, on or before December 10, 2024.

DATED this 18th day of September, 2024.

Respectfully submitted,

## NATIONAL SECURITY COUNSELORS

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United States Attorney

*s/ Kel McClanahan*

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## *Attorneys for Defendants*

I certify that this memorandum contains 164 words, in compliance with the Local Civil Rules.

1                   **[PROPOSED] ORDER**

2                   It is so ORDERED.

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4                   Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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7                   JAMES L. ROBART  
United States District Judge

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